

Before the  
Federal Communications Commission  
Washington, D.C., 20554

In the Matter of  
**Reply** Round for ET Docket #03-137 and WT Docket #12-357

Reply Filed by  
R. Paul and Kathleen Sundmark

### **Reply Comments on FCC Notice of Proposed Rulemaking**

We, R. Paul and Kathleen Sundmark, deem that our statements are true to the best of our knowledge.

1. Our mailing address is P.O. Box 9, Tujunga, CA 91043.
2. R. Paul Sundmark is a retired Outside Plant Technician for AT&T. Kathleen Sundmark is a licensed Doctor of Chiropractic. She practiced for 30 years specializing in neurology and internal disorders.
3. We believe that there has been sufficient research to establish the non-thermal biologic effects of RF at present exposure limits. The FCC should therefore promptly update its guidelines and implement measures to slow the exponential growth of wireless technologies in this society to protect the general public as well as workers from these effects. We urge an immediate reduction of exposure limits to a precautionary biologically-based level. The 2012 BioInitiative Report is incorporated by reference herein in its entirety (<http://www.bioinitiative.org/>)
4. The present "time-averaged" exposure standards do not account for pulsations and other signal modulations, time-varying exposures from multiple fixed and mobile sources, variations in the health status of exposed individuals, and more. We urge FCC to establish guidelines based upon true, often involuntary, exposure variations in the general and worker populations.
5. The GAO has reported that the FCC said it relies on federal health and safety agencies to determine exposure limits. It has not requested updated information on public and environmental safety for current exposures levels, nor an assessment of the wisdom of increasing exposure limits. We specifically urge the FCC to defer to the EPA for reliable exposure guidelines which protect the public, including vulnerable

subpopulations such as – but not limited to – young people, ill and disabled people, pregnant women, people of reproductive age, workers and the elderly, and the environment, including vulnerable species such as – but not limited to -- birds, bees and other pollinators, and amphibians.

6. FCC appeared to describe a conflict of interest when it stated in a case that serves both the public in terms of health and safety and the telecommunications industry that provides services. This is another reason for deferring to the EPA or other biological experts for a complete literature review and preparation of appropriate and precautionary exposure guidelines that adequately protect health and safety of the public.
7. Closing, we urge FCC to reevaluate its ability to uphold its responsibility to establish appropriate RF exposure guidelines based on public health and safety, not industry requirements. If it considers itself to be sufficiently expert in this task, we urge FCC not to raise, but to greatly reduce allowable exposures to precautionary levels in the face of research on non-thermal biological effects upon humans and the environment.
8. Further, a moratorium should be placed on sales of new spectrum, transmitting utility meter installation, and installation of additional base stations for wireless service while biologically-based safety limits are being developed.

Respectfully submitted,  
R.Paul and Kathleen Sundmark